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July 1, 2019

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: OMD Docket No. 19-105, Assessment and Collection of Regulatory Fees for FY 2019

Dear Ms. Dortch:

Pursuant to the Commission's Report and Order in MD Docket No. 15-121, Assessment and Collection of Regulatory Fees for FY 2015 (FCC 15-59, para. 26, rel. May 21, 2015) ("Report and Order") and subsequent request by Commission staff, Somos, Inc. submits the following information on Responsible Organizations (Resp Orgs) management of Toll-Free numbers (TFNs). The Commission staff has requested Somos provide this information in order to complete information in the Commission's Fee Filer system and to generate bills for Resp Orgs based on the total number of TFNs managed by each Resp Org, as required in the Report and Order.

Pursuant to section 0.459 of the Commission's rules, Somos respectfully requests confidential treatment for most of the information submitted — specifically, all columns of information except the Resp Org name and country. The remaining information is not otherwise publicly available, has not previously been publicly disclosed, and is not easily discernible from public information. The number of TFNs managed by an individual Resp Org is not public knowledge and is not available to anyone outside of Somos or our contractors. This is highly sensitive competitive information for each Resp Org and therefore warrants confidential treatment. The Resp Org's two-digit Resp Org ID is only available to users of the SMS/800 system and is not publicly available. As this is part of the Resp Org's login information, it is treated as propriety information under the Somos F.C.C. Tariff No. 1 (Section 2.6.1 (B)). Names and contact information of individuals within each Resp Org are also not publicly available and should remain confidential to protect the privacy of these individuals. Only Somos, our contractors, and other Resp Org users of our system have access to the Resp Org primary contact name and contact information. Only Somos and our contractors have access to the Resp Org primary billing contact name and contact information. Public release of this information could cause irreparable harm to those individuals.

The redacted version of this information is attached to this letter in the PDF format. Somos is sending a non-redacted version of this information in a Microsoft Excel spreadsheet to

the individuals listed below. This information is being sent for the sole purpose of setting up Resp Org accounts in the Commission's Fee Filer system, contacting the Resp Orgs to inform them that such accounts have been set up, and to generate bills under those accounts. Somos has been requested to provide this information to the Commission on an ongoing basis. Somos will continue to seek confidential treatment of this information in future filings.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel Bernstein". The signature is fluid and cursive, with the first name "Joel" being more prominent than the last name "Bernstein".

Joel Bernstein  
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cc: Roland Helvajian (via email with unredacted enclosure)  
Mika Savir (via email with unredacted enclosure)  
Thomas Buckley (via email with unredacted enclosure)